

STATE OF COLORADO  
Roy Romer, Governor  
DEPARTMENT OF NATURAL RESOURCES  
**DIVISION OF WILDLIFE**  
AN EQUAL OPPORTUNITY EMPLOYER  
Perry D. Olson, Director  
6060 Broadway  
Denver, Colorado 80216  
Telephone: (303) 297-1192

REFER TO



*For Wildlife—  
For People*

December 19, 1991

David Simonson  
Department of Energy  
Rocky Flats Office  
P. O. Box 928  
Golden, CO 80402-0928

RE: French Drain Proposal - Fish and Wildlife Coordination Act  
Migratory Bird Treaty Act  
Endangered Species Act

Dear Mr. Simonson:

We have reviewed these documents and have the following comments:

General: Apparently construction on the French Drain has already begun in advance of planning for habitat avoidance/mitigation. In the future we suggest that consideration for habitat be done in advance of earth moving activity, except in emergency situations.

FISH AND WILDLIFE COORDINATION ACT/MIGRATORY BIRD TREATY ACT

Because we missed both the meeting and field trip at which this project was explained in detail, we are struggling to understand the nature of this proposal, which is not explained in much detail in this document.

The main concerns from a wildlife habitat standpoint appear to be:

- 1) the loss of the woody and wetland vegetation at the west end of the French Drain; and
- 2) potential effects on Woman Creek and it's riparian zone from either sedimentation or de-watering as a result of the French Drain installation.

Discussing each separately:

Woody/Wetland Vegetation - From the description in the document, this area sounds like an excellent habitat area for many kinds of wildlife (apart from concerns about contamination). Assuming that the installation of a French Drain is absolutely necessary to control pollution from the site, we have no objection to this habitat impact occurring, but we suggest that the impacts be mitigated elsewhere as indicated in Section 6.0, first paragraph. If you desire our input on a mitigation plan let me know. I would suggest that the large trees to be removed from the hillside could be placed below the

(continued)

DEPARTMENT OF NATURAL RESOURCES, Kenneth Salazar, Executive Director  
WILDLIFE COMMISSION, William R. Hagberg, Member • Eldon W. Cooper, Chairman • Felix Chavez, Member • Rebecca L. Frank, Member  
Louis F. Swift, Member • George VanDenBerg, Member • Larry M. Wright, Member • Thomas M. Eve, Member

ADMIN RECORD

A-DU01-000955

interceptor ditch to form a brush pile for wildlife cover. Large down trees have many benefits to wildlife. If there is concern that the trees may be contaminated, feel free to ignore this suggestion.

Woman Creek Impacts - Possible impacts to Woman Creek and it's riparian zone appear to fall into two categories: sedimentation and water deprivation. The document discusses sedimentation as a concern, but it appears from Drawing 1 that much of the French Drain construction area is shielded from the creek by the presence of the Interceptor Ditch which would trap any sediment flowing downhill. Regardless, we think it is indeed important to prevent excess sedimentation from reaching Woman Creek by whatever means.

From the standpoint of water supply to Woman Creek from the hillside, even though the Interceptor Ditch clearly traps much of the flow, it appears that seepage below the ditch does provide some water to the creek area. Should the French Drain succeed in completely cutting off this flow, there might be some negative affect to the streamside habitat or the creek itself.

Other Comments: We are having trouble picturing what the completed French Drain would look like, but the description of the excavation gives the impression that a deep, steep-sided ditch will be in place. If this is the case, there may be a problem with deer getting trapped in the drain with no way to exit.

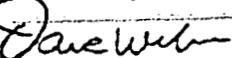
#### ENDANGERED SPECIES ACT

We don't believe that there is much potential for this project to negatively affect any threatened or endangered species of wildlife. With regard to other rare species, it appears that the main concern is for the Preble's meadow jumping mouse, which possibly could occur in this area. Assuming that the French Drain project is necessary to control pollution from above, and that the hillside to be excavated is possibly a contaminated habitat, we think that concern for the mouse is outweighed by the necessity of controlling pollution.

Your cover letter asks for our "concurrence" with these documents. Before issuing blanket approval of the project, we would need to know precisely what mitigating measures will occur to replace habitats to be lost and address the other concerns mentioned above.

Please let me know if you have any questions.

Sincerely,



Dave Weber  
Habitat Biologist

cc: Tom Howard, DWM

John Wegryzyn, USFWS  
Ron Cattany, DNR  
Gary Baughman, COOH